

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEFANO GRANATA; JUDSON THOMAS;
COLBY CANNIZZARO; CAMERON PROSPERI;
THE GUN RUNNER, LLC; and FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

ANDREA JOY CAMPBELL, in her official
capacity as Attorney General of the Commonwealth
of Massachusetts; and TERRENCE M. REIDY, in
his official capacity as Secretary of the Executive
Office of Public Safety and Security of the
Commonwealth of Massachusetts,

Defendants.

CIVIL ACTION
NO. 1:21-cv-10960-DJC

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(d)

Having conferred pursuant to Fed. R. Civ. P. 26(f) on December 22, 2023, with further consultation thereafter by e-mail, counsel for the above-captioned parties hereby submit this Joint Statement pursuant to Local Rule 16.1(d) in advance of the Scheduling Conference set for January 16, 2024.

I. Initial Disclosures

Counsel for the Parties have conferred regarding the Initial Disclosures required by Fed. R. Civ. P. 26(a) and have agreed to waive initial disclosures given the nature of the case.

II. Joint Discovery Plan and Schedule for Motions

The Parties have met and conferred about the deadlines and time frames for the discovery and other pretrial-related events. The Parties agree on the dates for the time to add parties and to

amend the pleadings. Otherwise, the Parties do not fully agree about the appropriate schedule of deadlines and time frames, and thus they provide below separate proposals for the remaining dates in the pretrial schedule:

	Plaintiffs' Proposal	Defendants' Proposal
Time to Join Parties	March 1, 2024	March 1, 2024
Time to Amend Pleadings	March 1, 2024	March 1, 2024
Fact Discovery Complete (including written discovery and non-expert depositions)	August 30, 2024	October 4, 2024
Expert Discovery		
Exchange of all expert reports as required by Rule 26(a)(2)(B):	July 1, 2024	November 22, 2024
Exchange of all rebuttal expert reports:	July 31, 2024	January 10, 2025
Expert discovery (including depositions) completed:	August 30, 2024	February 21, 2025
Dispositive Motions (including for summary judgment)		
Plaintiffs' Motion	October 11, 2024	April 9, 2025
Defendants' Opposition and Cross-Motion	November 8, 2024	May 14, 2025
Plaintiffs' Reply and Opposition to Cross-Motion	December 6, 2024	June 4, 2025
Pre-Trial Motions		60 days after dispositive motions decided
Final Pre-Trial Conference		To be set by Court

III. Certifications Pursuant to Local Rule 16.1(d)(3)

The Plaintiffs' Certification pursuant to Local R. 16.1(d)(3) is attached hereto as Exhibit

A. The Defendants' Certification pursuant to Local R. 16.1(d)(3) is attached hereto as Exhibit B.

IV. Consent to Trial by Magistrate Judge

Pursuant to Local R. 16.1(b)(3) the Parties' counsel have conferred with respect to whether they will consent to trial before a magistrate judge. The Parties do not consent to referring this case to a magistrate judge for trial.

Respectfully submitted,

STEFANO GRANATA; JUDSON THOMAS;
COLBY CANNIZZARO; CAMERON
PROSPERI; THE GUN RUNNER, LLC; and
FIREARMS POLICY COALITION, INC.,

ANDREA JOY CAMPBELL, ATTORNEY
GENERAL, and SECRETARY TERRENCE
M. REIDY,

By their attorneys,

By their attorneys,

/s/ Richard C. Chambers, Jr.

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Dated: January 5, 2024

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 5, 2024.

/s/ Phoebe Fischer-Groban
Phoebe Fischer-Groban
Assistant Attorney General